

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ILLINOIS NATIONAL INSURANCE COMPANY,

Plaintiff,

Case No. 07 CV 8248 (JFK)

- against -

**NOTICE OF CROSS-MOTION**

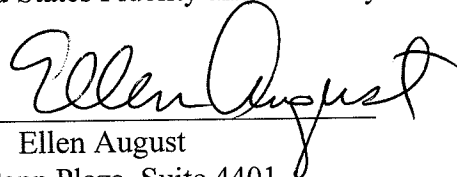
UNITED STATES FIDELITY AND GUARANTY,

Defendant.  
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**PLEASE TAKE NOTICE**, that upon the Affidavit of Kimberly Zanotta, sworn to on June 13, 2008, together with the exhibits annexed thereto, and the Affidavit of Norman Fidelman, sworn to on June 13, 2008, together with the exhibits annexed thereto, the undersigned will cross-move this Court at the Courthouse, located at 500 Pearl Street, New York, New York, for an Order granting defendant a stay of this action pending resolution of a pending arbitration entitled, "National Union Fire Insurance Company Of Pittsburgh, PA., On Behalf Of Itself And Each Of The Related Insurers That Provided Coverage To Respondent, Claimants, and Petrocelli Electric Co., Inc., Respondent", and awarding defendant such other and further relief as the Court deems just and proper.

Dated: New York, New York  
June 16, 2008

GOETZ FITZPATRICK LLP  
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United States Fidelity and Guaranty

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